

Comment Set 25

Ms. Valerie Van Way
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

Dear Ms. Van Way:

On behalf of Save The Bay's 10,000 members, please accept our comments on the Draft Environmental Impact Report (DEIR) for the Chevron Richmond Long Wharf Marine Terminal Lease Consideration. Save The Bay is the oldest and largest membership organization working exclusively to protect, restore and celebrate San Francisco Bay. As its leading champion, Save The Bay is committed to making the Bay cleaner and healthier and connecting residents to it.

Our comments are as follows.

The DEIR fails to consider replacement of the antiquated Long Wharf causeway and pier with contemporary offshore single point or other ship mooring facilities linked with buried pipelines conveying crude oil to shore.

The existing 1.5 mile long pier and causeway covers about 18 acres of the Bay that results in adverse impacts on public access to the Bay and its shoreline. The existing pier has negative recreational impacts on sailboats, power boats and self-powered water craft such as kayaks which are now forced to take a hazardous 1.5 mile detour into shipping channels with tankers and tug boats maneuvering to dock or go to sea. Consideration of an offshore single point or other ship mooring facility may reduce the recreational impacts caused by the existing Long Wharf facility.

25-1

Adverse recreational and land use impacts along the Bay shoreline due to the presence of equipment directly related to Long Wharf operations will persist if a new lease is granted. This equipment is already an obstacle for closing Bay Trail gaps linking the City of Richmond's residential areas with Point Molate, the Point San Pablo Peninsula, and the Richmond/San Rafael Bridge. This is in direct conflict with the Association of Bay Area Governments' (ABAG) San Francisco Bay Trail Plan, Contra Costa Countywide Bicycle and Pedestrian Plan, and the Metropolitan Transportation Commission's (MTC) Regional Bicycle Plan.

25-2

If a new lease is to be approved for continued operation of the fixed T-pier structure, negative environmental impacts to the Bay and shoreline access should be avoided or minimized. To the extent that a new lease causes unavoidable negative public access impacts on the Bay and its shoreline, sufficient mitigation should be a mandatory part of the new lease. The DEIR does not recommend mitigation for the significant adverse planning, recreational, transportation and land use impacts of a new lease.

25-3

Acceptable mitigation might include public access easements for two-way, multi-use Class I Bay Trail segments connecting Tewksbury Avenue with the existing trail on the south side of the Richmond/San Rafael Bridge toll plaza area and the north side of I-580 corridor with the City of Richmond's former Point Molate Naval Fuel Depot. In addition, Chevron could be required to provide funds to design, permit and build the planned Bay Trail between Tewksbury Avenue and the Richmond/San Rafael Bridge toll plaza area connecting to an existing CalTrans trail.

Thank you for considering Save The Bay's comments. We would appreciate receiving a copy of the Final EIR and other correspondence relating to this proposed new lease.

Sincerely,

David Lewis, Executive Director

cc: Bob Doyle - EBRPD
Steve McAdam - BCDC
Laura Thompson - ABAG
Bruce Beyaert - TRAC

Response to Comment Set #25

25-1

See DEIR Section 3.2, Alternatives Eliminated from Full Evaluation for discussion of alternative mooring configurations. Please also refer to responses to Comments 4-1 and 4-2.

25-2

Please refer to responses to Comments 3-3, 3-4, 3-5, 3-6, 3-7, 3-8, and 3-9.

25-3

Please refer to responses to Comments 3-1, first paragraph, 3-15, 4-1, and 4-2.